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UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

EDWEENA WASHINGTON and DAPHNE  
MOLEFE, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

CIRCLE MEDICAL TECHNOLOGIES,  
INC.,

Defendant.

Case No. 3:23-cv-01420-LB

**STIPULATION AND ORDER TO  
STAY PROCEEDINGS PENDING  
MEDIATION**

1 Plaintiffs Edweena Washington and Daphne Molefe (“Plaintiffs”) and Defendant Circle  
2 Medical Technologies, Inc. (“Defendant”) (collectively, the “Parties”), by and through their counsel,  
3 hereby stipulate and agree as follows:

4 WHEREAS, Plaintiffs filed their Complaint in this action on March 27, 2023; and

5 WHEREAS, Defendant filed its Answer to Plaintiffs’ Complaint on May 19, 2023; and

6  
7 WHEREAS, the Parties have agreed to participate in private mediation of this case with  
8 mediator Lynn P. Cohn, Professor at the Northwestern University School of Law, which is  
9 scheduled for September 26, 2023; and

10 WHEREAS, the Parties have agreed to engage in informal discovery by exchanging relevant  
11 information and documents to prepare for the mediation; and

12 WHEREAS, the Parties maintain that a stay of formal proceedings would conserve costs and  
13 judicial resources by allowing them to focus on preparing for and conducting settlement negotiations  
14 at the mediation without burdening the Court and the Parties with formal litigation;

15  
16 WHEREAS, upon completion of the mediation, the Parties will file a mediation status report  
17 to advise the Court of the outcome of the mediation;

18 WHEREAS, no Party to this action will be prejudiced by a stay of proceedings, and a stay  
19 will allow the Parties to avoid unnecessary costs and conserve judicial resources;

20 NOW THEREFORE, IT IS HEREBY STIPULATED by and between the Parties that:

- 21  
22 1. All proceeding in this action shall be stayed pending completion of the mediation on  
23 September 26, 2023; and  
24 2. The Parties will file with the Court a joint mediation status report on or before  
25 October 10, 2023.

26 ///

27 ///

1 IT IS SO STIPULATED.

2  
3 Dated: June 28, 2023

SCOTT EMPLOYMENT LAW PC

4 By: /s/ Justin M Scott  
5 Justin M. Scott  
6 *Attorneys for Plaintiffs*

7 Dated: June 28, 2023

NIXON PEABODY LLP

8  
9 By: /s/ Seth L. Neulight  
10 Seth L. Neulight  
11 Hillary J. Baca  
12 *Attorneys for Defendant*

13 **Signature Attestation**

14 Pursuant to Civil Local Rule 5-1(h)(3), the undersigned attests that each of the above  
15 signatories has concurred in the filing of this document.

16 /s/Seth L. Neulight

17 **ORDER**

18  
19 PURSUANT TO STIPULATION, IT IS SO ORDERED.

20  
21  
22 DATED: June 29, 2023

23   
24 HONORABLE LAUREL BEELER  
25 United States Magistrate Judge  
26  
27  
28